

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 999 18<sup>TH</sup> STREET - SUITE 500 DENVER, CO 80202-2466

ALIG 24 1998

Ref: 8P-W-GW

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Kathy Turner
Petroleum Engineering Technician
Petroglyph Operating Company, Inc.
P. O. Box 1839
Hutchinson, Kansas 67504-1839

RE: UIC PERMIT MODIFICATION

Conversion of Additional Well to

Antelope Creek Waterflood EPA Area Permit UT2736-00000 Duchesne County, Utah

Dear Ms. Turner:

Your letter of July 17, 1998, requesting that the following production well be converted to a Class II enhanced oil recovery well and added to the Antelope Creek Waterflood, as authorized under EPA Area Permit #UT2736-00000 is hereby granted.

NAME

LOCATION

EPA WELL PERMIT NO.

Ute Tribal #29-16

T 5 S - R 3 W #UT2736-04475 Duchesne County, UT

This additional well is within the boundary of the existing area permit for the Antelope Creek Waterflood (UT2736-00000), and this addition is made by permit modification according to the terms and conditions of that permit. Unless specifically mentioned in this Permit Modification, conversion is being made under the provisions of 40 CFR 144.33 and the terms and conditions of the original permit. The proposed well location, well schematic, conversion procedures, plugging and abandonment plan and schematic, submitted by your office, have been reviewed and approved as follows:

- (1) The **conversion** of this production well has been reviewed, and with modifications found satisfactory, therefore, no corrective action is required.
- (2) Maximum injection pressure (Pmax) the permittee shall limit the maximum surface injection pressure (Pmax) to 2217 psig. Permit provision have been made that allow the operator to request an increase or decrease in the injection pressure.





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The calculations for the fracture gradient was estimated from instantaneous shut-in pressures (ISIP's) observed during fracturing treatments performed on two (2) individually fraced zones within the Ute Tribal #29-16 well which established an average fracture gradient (Fg) of 0.913 psi/ft. This Fg is acceptable to the Environmental Protection Agency (EPA) and a theoretical maximum allowable surface injection pressure (Pmax), for this well, may be calculated as shown below:

Pmax = [Fg - 0.433 (Sg)] d

Where: Pmax = Maximum surface injection pressure at wellhead

Sg = Specific gravity of injected water

Pmax = [0.913 - .433 (1.00)] 4619

Pmax = 2217 psig

Until such time as the permittee demonstrates that a fracture gradient other than 0.913 psi/ft applies to the disposal zones of this newly converted well, the maximum allowable wellhead injection pressure (Pmax) for this well will be 2217 psig.

- (3) The plugging and abandonment plan and schematic, submitted by your office, has been reviewed, and approved.
- (4) As no cement bond log (CBL) is available to determine the effectiveness of annulus cement above the top perforations, the permittee shall run a CBL from plug back total depth (5806 feet) to 200 feet above top perforations (4619 feet). The CBL is an approved tool delineating confinement of the injectate to the permitted formation; see enclosure for CBL logging techniques and interpretation.

Prior to commencing injection into this well, permittee must fulfill permit condition Part II, C. 2. and have received separate written authorization to inject by the Environmental Protection Agency. In summary, these requirements for your newly permitted injection well are:

(1) All conversion is complete and the permittee has submitted a completed Well Rework Record (EPA Form 7520-12).

- (2)The pore pressure has been determined.
- The well has successfully completed and passed a mechanical integrity test, with pressure chart; EPA form enclosed; and
- Submitted a CBL with brief narrative identifying top of (4)cement, for approval to insure adequate bonding.

All other provisions and conditions of the permit remain as originally issued July 12, 1994.

If you have any questions, please contact Mr. Chuck Williams at (303) 312-6625. Also, please direct the above requirements to Mr. Williams at the above letterhead address, citing MAIL CODE 8P-W-GW. Thank you for your continued cooperation.

Kerrigan G. Clough

Assistant Regional Administrator

Office of Partnerships and Regulatory Assistance

Enclosure: EPA MIT Form

Guidance; Cement Bond Logging Techniques and

Interpretation

cc: Mr. Ronald Wopsock, Chairman

Ute Indian Tribe

Ms. Elaine Willie, Environmental Director

Ute Indian Tribe

Norman Cambridge

BIA - Uintah & Ouray Agency

Mr. Jerry Kenczka

BLM - Vernal District Office

Mr. Gilbert Hunt

State of Utah Natural Resources Division of Oil, Gas & Mining

s your RETURN ADDRESS comple	8/26/98 CW 3378C AUG 27  SENDER:  Complete items 1 and/or 2 for additional services.  Complete items 3, 4a, and 4b.  Print your name and address on the reverse of this form so that we card to you.  Attach this form to the front of the mailpiece, or on the back if spacepermit.	1998 e can return this	I also wish to receive the following services (for an extra fee):  1.  Addressee's Address		ce.
	<ul> <li>Write "Return Receipt Requested" on the mailpiece below the article number.</li> <li>The Return Receipt will show to whom the article was delivered and the date delivered.</li> </ul>				ceipt Service
	3. Article Addressed to: Ms. Kathy Turner	4a. Article Nu			
	Geology/Petroleum Engineering Technician Petroglyph Operating Company, Inc. P.O. Box 1839 Hutchinson, KS 67504-1839	4b. Service T ☐ Registered ☐ Express N	red Certifi Mail Insure eccipt for Merchandise COD		Thank you for using
	6. Signature: (Addressee or Agent)  X  PS Form 3911	8. Addressee's Address (Only if requested and fee is paid)  SEP 4 1998  2595-97-B-0179 Domestic Return Receipt		1 1998	
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P 380 306 046 US Postal Service 8/26/98 CW 3378C Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse) Sent to Ms. Kathy Turner Geology/Petroleum Engineering Technician P Code Petroglyph Operating Company, PsQ Box 1839 \$ Hutchinson, KS 67504-1839 Special Delivery Fee Restricted Delivery Fee Return Receipt Showing to Whom & Date Delivered Return Receipt Showing to Whom, Date, & Addressee's Address TOTAL Postage & Fees \$ Postmark or Date